

26 June, 2000

①

Federal Aviation Administration  
Office of Chief Counsel  
Attn: Rules Docket, Docket No. 30086  
800 Independence Avenue, SW., Room 915H  
Washington, DC 20591

RECEIVED  
OFFICE OF THE  
CHIEF COUNSEL  
RULES DOCKET  
2000 JUL -5 A 11:11

Gentlemen;

Thank you for the opportunity to comment and provide some information on the issue of nonmilitary helicopter noise complaints.

I am a police sergeant and the officer in charge of a law enforcement air support unit comprised of two MD500E light turbine helicopters providing service to a community of 140,000 in southern California. We operate from 0730 until 0300 daily except week-ends when we operate from 1700 until 0300. I have been in charge of this unit since its inception in early 1990, during which time the Unit has accrued some 23,000 flight hours.

1. What are the types of helicopter operations (law enforcement, electronic news gathering, sightseeing tours, etc.) that elicit the negative response by individuals in densely populated areas?

It has been my experience that negative responses from the public to law enforcement helicopter operations has been minimal and generally occur during late night and low level (i.e. less than 500 feet above ground level) operations.

2. What air traffic control procedures are applicable in addressing helicopter noise reduction? Why?

Air traffic control procedures it seems would be of several types, including specific routing, hours of operations restrictions and altitude restrictions.

Since law enforcement is inherently reactive and no control exists over the locations or times of crimes, routing or hours of operations restrictions would essentially disallow airborne law enforcement the latitude necessary to accomplish the mission.

The majority of law enforcement helicopter operations are conducted at or above five hundred feet above ground level in circular orbits for a variety of reasons. There are occasions, however, when it is necessary to fly lower and slower;

sometimes landing in business or residential areas. These occur, for example, when ground officers require immediate physical assistance, in order to better provide information to enhance the safety not only of the officers but also of the public, and during crowd control incidents. Altitude restrictions therefor would seriously inhibit the conduct of airborne law enforcement operations.

3. What impacts could restrictive air traffic control procedures have on operations of:

Law enforcement helicopters?

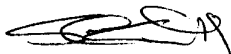
.....

Based on the foregoing, law enforcement helicopter operations would probably be severely hampered should restrictive air traffic control procedures be instituted.

4. What are the recommended solutions for reduction of the effects of nonmilitary helicopter noise?

In the event that the effect of nonmilitary helicopter noise proves to be of such magnitude as to require Congressional intervention, perhaps an education campaign directed at the public might be in order. Should helicopters be flying so low as to create a significant noise problem, they certainly may be violating one or more of the federal aviation regulations that presently exist and can thus be dealt with through intervention of that agency.

Sincerely,



Steven C. Smith, Sergeant/O.I.C.  
Ontario Police Department  
Air Support Unit  
2161 East Avion Street, Hangar One  
Ontario CA 91761  
(909) 390-5390